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December 19, 2006

## VIA CM/ECF AND HAND DELIVERY

John E. James, Esquire Potter Anderson & Corroon LLP 1313 N. Market Street P.O. Box 951 Wilmington, DE 19899-0951

Re:

Magten Asset Management Corp. and Law Debenture Trust Co. v.

NorthWestern Corp.; C.A. No. 04-1494-JJF;

Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt;

C.A. No. 05-0499-JJF; and

Magten Asset Management Corp. v. Paul Hastings Janofsky & Walker,

LLP; C.A. No. 04-1256-JJF,

## Dear Special Master:

Magten Asset Management and Law Debenture Trust Company of New York, the plaintiffs in the above-captioned matters, respectfully submit to the Special Master a courtesy copy of their Motion to Compel Discovery from NorthWestern Corporation and defendants Hanson and Kindt. Also enclosed is a copy of a letter sent to Judge Farnan apprising the Court that Plaintiffs believe the Special Master has authority with respect to discovery issues in these cases.

If the Special Master's calendar permits, plaintiffs respectfully request an in-person conference with the Special Master that may facilitate a proper resolution of the issues raised in the Motion to Compel without the need for further briefing.

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Should you wish to discuss, counsel is available at your convenience.

Respectfully submitted,

Dale K. Obé MOC4048)
Dale R. Dubé

I.D. No. 2863

## DRD/pb Enclosures

cc: (All cc's sent without enclosures)

Clark of Count (via CM/ECE and b

Clerk of Court (via CM/ECF and hand delivery)

Bijan Amini, Esquire (via e-mail and Federal Express)

Jesse H. Austin, III, Esquire (via e-mail and Federal Express)

Kimberly A. Beatty, Esquire (via e-mail and Federal Express)

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